

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>TRAVIS JONES,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:12-CV-01220 ERW</b>
	)	
<b>CITY OF ST. LOUIS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**CONSENT MOTION OF PLAINTIFF FOR  
EXTENSION OF TIME TO COMPLETE MEDIATION**

COMES NOW Plaintiff, Travis Jones, by undersigned counsel, and respectfully moves the Court for entry of an order granting the parties until Friday, August 16, 2013 to complete ADR. In support Plaintiff states to the Court as follows:

1. On January 24, 2013 the parties attended and completed the Rule 16 Scheduling Conference. Pursuant to the Scheduling Order entered in this case, the referral for ADR was to begin on April 15, 2013 and terminate on July 15, 2013.

2. The parties have tentatively selected Judge Steven Limbaugh as the mediator in this case.

3. The parties have exchanged their initial Interrogatories and Request for Production of Documents.

4. Following the exchange of written discovery responses, the parties would like to engage in some deposition discovery before proceeding to mediation.

5. The parties have conferred with Judge Limbaugh to obtain his available dates to mediate the case during the latter half of June and the first week of July. Judge Limbaugh is available during those weeks, however, Defense counsel Karin Schute will be in trial and

unavailable the latter half of June. In addition, Counsel for Plaintiff will be on vacation the first half of July.

6. In light of the parties need for additional discovery and the unavailability of some of the parties' counsel to mediate the case, the parties are requesting an additional 30 days to complete the ADR process.

7. The parties will have a more productive mediation session and potentially resolve this case if the mediation could take place on or before August 16, 2013.

8. Counsel for Defendants has consented to this Motion. See Exhibit A – email from Defense Counsel to Jason A. Charpentier.

WHEREFORE, Plaintiff Travis Jones, with the consent of the parties, respectfully requests that the Court grant the parties until August 16, 2013 to complete ADR, and grant any other further relief as the Court deems to be reasonable, just and proper.

Respectfully submitted,

GROWE, EISEN, KARLEN, LLC

/s/ Jason A. Charpentier

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**CERTIFICATE OF SERVICE**

I certify that on this 10th day of May 2013, I electronically filed the foregoing with the clerk of this Court by using the CM/ECF system, to be served by operation of the Court's electronic filing system, to the following:

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